

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

JANICE HARGROVE WARREN

PLAINTIFF

v.

No. 4:19-cv-00655-BSM

CHARLES MCNULTY, et al.

DEFENDANTS

UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants, Pulaski County Special School District (“District”), Mike Kemp, Linda Remele, Shelby Thomas, Alicia Gillen, Eli Keller, and Brian Maune, by their attorneys, Bequette, Billingsley & Kees, P.A., for their Unopposed Motion for Extension of Time, allege and state:

1. Plaintiff filed her Response (Doc. 36) to Defendants’ Motion for Summary Judgment (Doc. 27) at midnight on September 9, 2020, with the final related filing notice being received at 2:01 a.m. on September 10, 2020. Included with Plaintiff’s filings were numerous exhibits that appeared to have been filed randomly and out of order.

2. Plaintiff’s counsel attempted to correct the filing of her Response (ECF Doc. 40, which included 75 exhibits) at 1:11 p.m. on September 11, 2020, and filed her updated Memorandum of Points and Authorities (ECF Doc. 43) at 5:24 p.m. on September 11, 2020.

3. For purposes of this Motion for Extension of Time, Defendants respectfully request that the clock start on Friday, September 11, for calculating Defendants’ reply deadline.

4. Defendants request a short extension of time to file their reply to Plaintiff’s Response to Defendants’ Motion for Summary Judgment, such that Defendants’ reply will be due on or before September 25, 2020.

5. Defendants request the additional days to file their reply in order to review Plaintiff’s voluminous filings and attached exhibits.

6. Defendants state that the short extension of time is not sought for purposes of delay but to assure the prompt and efficient administration of justice in this case.

7. Counsel for Defendants has conferred with Plaintiff's counsel concerning this request and is authorized to state that said counsel does not oppose the extension of time requested herein.

WHEREFORE, Defendants, Mike Kemp, Linda Remele, Shelby Thomas, Alicia Gillen, Eli Keller, Brian Maune, and the Pulaski County Special School District, pray that this Court grant them up to and including September 25, 2020 to file their reply to Plaintiff's Response to Defendants' Motion for Summary Judgment; and for all other just and proper relief to which Defendants may be entitled.

Respectfully submitted,

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